LOS ANGELES, CA 90012 KATE\_MORRIS@FD.ORG (213) 894-2854 UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CASE NUMBER UNITED STATES OF AMERICA, **PLAINTIFF** 23-CR-00216-RGK v. PHILIP ALAN DRECHSLER APPLICATION FOR REVIEW/RECONSIDERATION OF ORDER **SETTING CONDITIONS OF** RELEASE/DETENTION DEFENDANT. (18 U.S.C. §3142) AND REQUEST FOR HEARING Application is made by □ plaintiff ☑ defendant PHILIP ALAN DRECHSLER that a hearing be held to review /reconsider the decision of ☐ United States District Judge by order dated: Magistrate Judge ALKA SAGAR by order dated: JUNE 6, 2023 denying release and imposing detention under subsection □ (d) or **(e)** of Title 18 U.S.C. §3142; or □ ordering release upon certain conditions, or ☐ denying detention. This application is made pre-sentence □ post-sentence based on the following facts not previously considered by said judicial officer or changed circumstances as follows: (1) Mr. Drechsler to reside at Extended Stays America in Burbank until he can rent his own apartment (2) Condition prohibiting contact with defendant's wife M.D. and daughter J.D. Relief sought (be specific): (1) \$15,000 appearance bond signed by Jon Werner, plus \$20,000 cash deposit by Mr. Drechsler within one week of release; (2) Home incarceration at Extended Stays America (Burbank), and thereafter at his own apartment; (3) Travel restricted to C.D. Cal. and passport surrender; (4) Location monitoring with ankle monitor; (5) No contact with wife M.D. and daughter J.D.; (6) All conditions relating to cases involving sex-offense allegations; (7) No internet-enabled devices; (8) No firearms Counsel for the defendant and plaintiff United States Government consulted on September 1, 2023 and opposing counsel declines to stipulate to an order providing the relief sought. ▼ Telephonic notice given to □ AUSA □ Defendant's Counsel ▼ PSA □ Interpreter □ USM □ Probation on September 1, 2<u>023</u> \_\_\_\_\_\_. An interpreter is □ required ☑ not required. Language Defendant is **▼** in custody □ not in custody. 9/1/2023 /s/ Kate L. Morris Date Moving Party

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DEPUTY FEDERAL PUBLIC DEFENDER

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